

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 1:16CR00134 SNLJ
	)	
MICHAEL MCNAIR, SR.,	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION FOR EXTENSION OF TIME**  
**TO FILE AMENDED MOTION FOR COMPASSIONATE RELEASE**

COMES NOW Defendant, by and through the undersigned counsel, and respectfully moves the Court for an Order extending the time within which a supplemental motion to defendant's Motion for Compassionate Release must be filed by an additional 30 days or until January 16, 2021.

Counsel is in the process of reviewing Mr. McNair's case and gathering records. Counsel has requested additional records that we have yet to receive. Counsel requests an additional 30 days to properly investigate and analyze Mr. McNair's request for compassionate release.

WHEREFORE, in the interests of justice and for good cause shown, it is prayed that the Court grant Defendant's request to extend the deadline for the filing of any supplemental motion by thirty days or until January 16, 2021.

Respectfully submitted,

/s/Scott Tilsen  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the United States Attorney's Office.

/s/Scott Tilsen

Scott F. Tilsen